







## Should This Employee File the Confidential Financial Disclosure Report?

This worksheet assists DEOs in determining whether a career employee should file the Confidential Financial Disclosure Report (OGE Form 450). Do not use this tool for Experts, Consultants, Special Government Employees, SES or other types of appointments (e.g., SL/ST, AD, Schedule C or Title 42). Those employees do not fill out the OGE- 450. If you have questions, contact OGC/Ethics or your regional ethics counsel.

I. Pay Level of Employee		
<p>1. <input type="checkbox"/> Is the employee's position classified at or below the GS-15 level?</p>  <p style="text-align: center;">_____ Employee's Name</p>	<p><input type="checkbox"/> Yes</p> <p>Go to question 2</p>	<p><input type="checkbox"/> No</p> <div style="text-align: center;">  <p>See Footnote 1</p> </div>
II. Type of Work Done By the Employee		
<p>2. Does the employee's work involve at least one of the following duties:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> contracting or procurements (e.g., contracting officer representatives);</li> <li><input type="checkbox"/> administering, awarding, monitoring, or making determinations regarding grants, subsidies, licenses, or other federal benefits (e.g., Grants Officers and Project Officers responsible for managing grants or assistance agreements) ;</li> <li><input type="checkbox"/> regulating, auditing, or inspecting non-federal entities* (e.g., attorneys, On-Scene Coordinators, Remedial Project Managers, auditors of non-federal entities, criminal investigators, civil investigators, inspectors, other employees whose duties include personal and substantial participation in Agency permitting activities) ; or</li> <li><input type="checkbox"/> performing other activities when they will have a direct and substantial effect on the financial interests of non-federal entities* (e.g., attorneys, supervisors, national experts)</li> </ul> <p><i>*Non-federal entities include industry, businesses, non-profit organizations, and state and local governments.</i></p>	<p><input type="checkbox"/> Yes</p> <p>Go to question 4</p>	<p><input type="checkbox"/> No</p> <p>Go to question 3</p>
<p>3. Is the employee serving in any other position where there is a potential for conflict of interest, appearance of favoritism or loss of impartiality?</p> <p>Examples include:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> investigating or prosecuting violations of criminal or civil law;</li> <li><input type="checkbox"/> representing the United States in litigation or other proceedings;</li> <li><input type="checkbox"/> scientific or social science research, when the research will have a direct and substantial effect on the financial interests of non-federal entities.</li> </ul> <p><i>* Contact OGC/Ethics if you need additional guidance.</i></p>	<p><input type="checkbox"/> Yes</p> <p>Go to question 4</p>	<p><input type="checkbox"/> No</p> <div style="text-align: center;">  </div> <p>If you said "no" to questions 2 and 3, then the employee does not need to file.</p>

Footnote 1: Consult with OGC/Ethics to determine if this employee must file a different form. SGEs, SES, ALJ, SL/ST, non-career employees fill out a different form.

<p>4. Does the employee:</p> <p><input type="checkbox"/> only provide information?</p> <p>Example: A GS-11 program analyst shows staff members how to research environmental compliance of regulated entities using agency's electronic databases. The program analyst does not make decisions on whether to take enforcement actions.</p> <p><input type="checkbox"/> work on administrative or peripheral matters only?</p> <p>Example: Your office has just hired a GS-7 Procurement Assistant who is responsible for processing procurement documents, answering status inquiries from the public, performing office support duties such as filing and copying, and maintaining an online contract database. The Assistant has no actual contracting or procurement responsibilities.</p>	<p><input type="checkbox"/> Yes</p>  <p>The employee does not need to file a confidential financial disclosure report.</p>	<p><input type="checkbox"/> No</p> <p>Go to question 5</p>
<h3>III. Employee's Level of Responsibility</h3>		
<p>5. Does the employee:</p> <p><input type="checkbox"/> engage in the work activity identified in Section II by exercising significant judgment in performing any of the following job functions?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> making decisions;</li> <li><input type="checkbox"/> approving or disapproving;</li> <li><input type="checkbox"/> making recommendations;</li> <li><input type="checkbox"/> conducting investigations;</li> <li><input type="checkbox"/> rendering advice or opinions.</li> </ul> <p><input type="checkbox"/> actively supervise a subordinate's performance of any of the above-listed job functions?</p>	<p><input type="checkbox"/> Yes</p> <p>Go to question 6</p>	<p><input type="checkbox"/> No</p>  <p>The employee does not need to file a confidential financial disclosure report.</p>
<p>6. Does the employee receive substantial supervisory review?</p> <p>Example: A GS-13 employee conducts the initial agency review of grant applications from nonprofit organizations and advises the Office Director about the merits of each application. Although the process of reviewing the grant applications entails significant judgment, the employee's analysis and recommendations are reviewed by Office Director, and it is the Office Director who decides which grants to award.</p> <p>_____ Reviewer's Signature</p>	<p><input type="checkbox"/> Yes</p>  <p>The employee does not need to file a confidential financial disclosure report.</p>	<p><input type="checkbox"/> No</p>  <p>The employee should file a confidential financial disclosure report.</p>